

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

In re Terrorist Attacks on September 11, 2001	03-md-1570 (GBD)(SN) ECF Case
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**This document relates to:**

*Burnett, et al. v. Islamic Rep. of Iran, et al.*, No. 15-cv-9903 (GBD)(SN)

**NOTICE OF MOTION FOR ENTRY OF PARTIAL FINAL DEFAULT JUDGMENTS  
ON BEHALF OF NON-NATIONAL 9/11 PERSONAL-INJURY PLAINTIFFS**

**(BURNETT NON-NATIONALS 3)**

PLEASE TAKE NOTICE that upon the accompanying declaration of John M. Eubanks, with exhibits, and the accompanying memorandum of law, Plaintiffs in the *Burnett* action pending before the Court identified in Exhibit A—individuals who were not U.S. nationals when they sustained physical injuries in the terrorist attacks on September 11, 2001 in and around the World Trade Center complex in New York—respectfully move this Court for partial final default judgment awarding them compensatory damages for pain and suffering they sustained as a result of their injuries on September 11, 2001. The Plaintiffs also seek (1) prejudgment interest at the rate of 4.96 percent per annum, compounded annually for the period from September 11, 2001 until the date of the judgment; (2) permission to seek economic-loss, punitive, or other damages at a later date; and (3) for all other personal-injury plaintiffs in *Burnett* who were not U.S. nationals on September 11, 2001 to submit applications for damages awards in later stages, to the extent such awards have not previously been addressed.

Plaintiffs seek this relief and such other appropriate relief as the Court deems appropriate.

Dated: June 12, 2024

Respectfully submitted,

MOTLEY RICE LLC

/S/ John M. Eubanks

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